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December 10, 2002

Paul B. Baker, Reclamation Biologist State of Utah Department of Natural Resources Division of Oil, Gas and Mining 1594 West North Temple, Suite 1210 P.O. Box 145801 Salt Lake City, UT 84114-5801 RECEIVED

DEC 1 3 2002

DIV. OF OIL, GAS & MINING

Re: Electric Transformers at Mine Sites

Dear Mr. Baker:

The Division of Oil, Gas and Mining (the "Division") conducted Site Inspections at the Rim Mine (Permit M/037/006) on August 14, 2002, and at the Hecla Shaft (Permit M/037/043), Redd Block IV (Permit M/037/046), LaSal/Beaver/Snowball (Permit M/037/026), and the Pandora (Permit M/037/012) on May 1, 2002, and again on August 15, 2002. Representatives of the Operator accompanied the Division personnel and the BLM representative on the inspections on August 15.

One item noted during the Site Inspections was the topic of electrical transformers at the mine sites. The Division inspectors and the BLM representative requested that the Operator provide a list of the transformers at the mine sites, and the list is to include the PCB analyses that were performed on the transformers. This list is attached herewith.

In response to a specific incident at the Rim Mine, and to address other stability and security concerns, the Operator has undertaken a number of actions pertaining to electrical transformers at the mines sites. The following chronology describes site activities that have involved transformers at the mine sites:

1. April, 2002 – **Rim Mine**. The BLM Monticello office and San Juan County notified the Operator that a transformer pole (service to mine vent hole) had blown down at the Rim Mine and spilled the contents of three transformers. The Operator dispatched a representative to test the spilled oil for PCB contamination and to clean up the debris from the incident. The quick field tests for PCB's in the oil had negative results (PCB -i'ree). The contaminated soil was aerated by chiseling, and the spill site was fenced. The three damaged transformers were removed to the White Mesa Mill. Samples of the oil and the contaminated soil were taken by the BLM and San Juan County representatives. Subsequent analyses of these samples showed PCB levels below detection limits.

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2. September 2002 - Rim Mine. The Operator initiated a number of site cleanup and maintenance activities (will be reported separately) in September. During the April incident and the Site Inspection by Division personnel in August, a transformer platform was noted to be sagging, and the transformers appeared to be in possible danger of toppling. The Division requested that the Operator solve this problem. The three transformers were removed from the platform in September 2002 and moved to the White Mesa Mill for secure storage. The site of the April transformer oil spill was re-aerated.

- 3. October 2002 Pandora Mine. During surveying work to update site maps, the Operator discovered that the main transformer bank at the Pandora Mine had been vandalized three transformers were shot which lead to leakage of a portion of the oil contents of the transformers. Upon learning of this incident, the Operator directed equipment and personnel that were conducting maintenance activities at nearby mine sites to relocate to the Pandora site. All transformers were removed from the platform (there were six transformers at this site), and these transformers have been moved to the White Mesa Mill for secure storage. The oil-contaminated soil under the transformer platform was thoroughly aerated by chiseling. Additional aeration will be performed in the future to ensure success of this remediation technique.
- 4. October 2002 **Pandora West Underground**. Three transformers, which provide underground power, were removed from the platform in the field, and the transformers were moved to the White Mesa Mill for secure storage.
- 5. October 2002 **2200 Vent**. A total of four transformers were removed at a transformer platform which provided power to a vent fan. The transformers were moved to the White Mesa Mill for secure storage.
- 6. October 2002 LaSal Mine yard. Three transformers, which provided power for a compressor station in the LaSal yard, had been removed from a platform by the previous Operator. These transformers were sitting on the ground and were unsecured, so they were moved to the White Mesa Mill for secure storage.
- 7. October 2002 **Hecla Shaft**. One large transformer used to provide surface power at the mine site was moved to the White Mesa Mill for secure storage.

The transformers noted in the descriptions above are highlighted in yellow on the attached list.

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The Operator has been surveying all mines sites in conjunction with the request for extension of "Suspended Operations" status at the mines and to provide updated site maps to support reclamation surety review. The Operator has also performed a number of site maintenance chores (some of which are noted herein); the site activities will be reported in detail when we submit new site maps in the next few weeks.

Please contact me at 303-389-4161 or by e-mail at 'twetz@intluranium.com' if you have any questions.

Sincerely,

Terry V. Wetz

Director of Project Development

International Uranium (USA) Corporation

#### Attachment

cc: Denice Swanke, Moab BLM

Ted McDougall, Monticello BLM

Ronald E. Berg

David C. Frydenlund

Ron F. Hochstein

Central Files Permits: M/037/043

M/037/026

M/037/012

M/037/046

M/037/006

# INTERNATIONAL URANIUM (USA) CORPORATION INVENTORY OF TRANSFORMERS - UTAH

December 2002

Permit/Mine Rim Mine Permit M/037/006	Manufacturer	Manufacturer <u>Serial No.</u>	KVA	Sample <u>Date</u>	PCB (ppm)	Laboratory Sheet Avail.	<u>Comments</u>
Water Plant	RTE	811027744	15	9/6/1989	N.D.	Yes	
Water Plant	RTE	811114596	15	9/6/1989	N.D.	Yes	
Water Plant	RTE	811114595	15	9/6/1989	N.D.	Yes	
#1 Vent Hole	T&R	13731	75	9/6/1989	N.D.	Yes	Removed Apr. 2002
#1 Vent Hole	T&R	13732	75	9/6/1989	N.D.	Yes	Removed Apr. 2002
#1 Vent Hole	T&R	13738	75	9/6/1989	N.D.	Yes	Removed Apr. 2002
Main Sub	RTE	751065021	167	9/6/1989	N.D.	Yes	Removed Sep. 2002
Main Sub	RTE	761012284	167	9/6/1989	N.D.	Yes	Removed Sep. 2002
Main Sub	RTE	761027985	167	9/6/1989	N.D.		Removed Sep. 2002
Hoist	Westinghouse	63SK116	100	9/6/1989	N.D.	Yes	1 Como vod Gop. 2002
Hoist	Westinghouse	63SK118	100	9/6/1989	N.D.	Yes	
Hoist	Westinghouse	63SJ2017	100	9/6/1989	N.D.	Yes	

#### Pandora

#### Permit M/037/012

Westinghouse	78A472539	167	8/31/1989	N.D.	Yes	Removed Oct. 2002
Westinghouse	78A473301	167	8/31/1989			Removed Oct. 2002
Westinghouse	79A204722	167	8/31/1989			Removed Oct. 2002
Wagner	5L14189	167	8/31/1989			Removed Oct. 2002
Wagner	5L16415					Removed Oct. 2002
Wagner	5L16416					Removed Oct. 2002
T&R	20203					Removed Oct. 2002
T&R	20202					Removed Oct. 2002
T&R	20204					Removed Oct. 2002
RTE	772019732					Removed Oct. 2002
RTE	772019736					
RTE	772019733					
RTE	772029854					
RTE	772029852					
RTE						
Howard Ind.						
Howard Ind.						
Howard Ind.	422154575	167	8/31/1989	N.D.	Yes	
	Westinghouse Wagner Wagner Wagner T&R T&R T&R RTE RTE RTE RTE RTE RTE RTE RTE RTE RT	Westinghouse         78A473301           Westinghouse         79A204722           Wagner         5L14189           Wagner         5L16415           Wagner         5L16416           T&R         20203           T&R         20202           T&R         20204           RTE         772019732           RTE         772019736           RTE         772019733           RTE         772029854           RTE         772029852           RTE         772029851           Howard Ind.         422144575           Howard Ind.         422164575	Westinghouse         78A473301         167           Westinghouse         79A204722         167           Wagner         5L14189         167           Wagner         5L16415         167           Wagner         5L16416         167           T&R         20203         167           T&R         20202         167           T&R         20204         167           RTE         772019732         50           RTE         772019736         50           RTE         772019733         50           RTE         772029854         50           RTE         772029852         50           RTE         772029851         50           Howard Ind.         422144575         167           Howard Ind.         422164575         167	Westinghouse         78A473301         167         8/31/1989           Westinghouse         79A204722         167         8/31/1989           Wagner         5L14189         167         8/31/1989           Wagner         5L16415         167         8/31/1989           Wagner         5L16416         167         8/31/1989           T&R         20203         167         9/5/1989           T&R         20202         167         9/5/1989           T&R         20204         167         9/5/1989           RTE         772019732         50         8/31/1989           RTE         772019736         50         8/31/1989           RTE         772019733         50         8/31/1989           RTE         772029854         50         9/5/1989           RTE         772029852         50         9/5/1989           RTE         772029851         50         9/5/1989           Howard Ind.         422144575         167         8/31/1989           Howard Ind.         422164575         167         8/31/1989	Westinghouse         78A473301         167         8/31/1989         N.D.           Westinghouse         79A204722         167         8/31/1989         N.D.           Wagner         5L14189         167         8/31/1989         N.D.           Wagner         5L16415         167         8/31/1989         N.D.           Wagner         5L16416         167         8/31/1989         N.D.           T&R         20203         167         9/5/1989         53.0           T&R         20202         167         9/5/1989         30.0           T&R         20204         167         9/5/1989         41.0           RTE         772019732         50         8/31/1989         N.D.           RTE         772019736         50         8/31/1989         N.D.           RTE         772019733         50         8/31/1989         N.D.           RTE         772029854         50         9/5/1989         N.D.           RTE         772029852         50         9/5/1989         N.D.           RTE         772029851         50         9/5/1989         N.D.           Howard Ind.         422144575         167         8/31/1989         N.D.	Westinghouse         78A473301         167         8/31/1989         N.D.         Yes           Westinghouse         79A204722         167         8/31/1989         N.D.         Yes           Wagner         5L14189         167         8/31/1989         N.D.         Yes           Wagner         5L16415         167         8/31/1989         N.D.         Yes           Wagner         5L16416         167         8/31/1989         N.D.         Yes           T&R         20203         167         9/5/1989         53.0         Yes           T&R         20202         167         9/5/1989         30.0         Yes           T&R         20204         167         9/5/1989         41.0         Yes           RTE         772019732         50         8/31/1989         N.D.         Yes           RTE         772019736         50         8/31/1989         N.D.         Yes           RTE         772019733         50         8/31/1989         N.D.         Yes           RTE         772029854         50         9/5/1989         N.D.         Yes           RTE         772029852         50         9/5/1989         N.D.         Yes

### LaSal/Snowball/Beaver

## Permit M/037/026

Snowball Main Sub	Moloney	1543541	100	8/31/1989	N.D	Yes	
Snowball Main Sub	Moloney	1537621	100	8/31/1989	N.D	Yes	
Snowball Main Sub	Moloney	1543538	100	8/31/1989	N.D	Yes	
#1 Vent Hole	Moloney	1505303	50	8/31/1989	N.D	Yes	
#1 Vent Hole	Moloney	1489730	50	8/31/1989	3.2	Yes	
#1 Vent Hole	Weaver	18216	50	8/31/1989	N.D	Yes	
#2 Vent Hole	Westinghouse	61H12391	50	8/31/1989	14.0	Yes	
#2 Vent Hole	Westinghouse	61H12392	50	8/31/1989	12.0	Yes	
#2 Vent Hole	Westinghouse	61H12393	50	8/31/1989	20.0	Yes	
Undgrnd & Vent 1800	Weaver	19718	100	1/24/1985	4.6	Yes	
Undgrnd & Vent 1800	Weaver	19720	100	1/24/1985	N.D	Yes	
Undgrnd & Vent 1800	Weaver	19719	100	1/24/1985	8.4	Yes	
Betz	Marcus	18179	100	8/22/1989	N.D	Yes	
2300 Vent Hole	Westinghouse	17457	75	8/31/1989	4.4	Yes	
2300 Vent Hole	T&R	31147	100	8/31/1989	32.0	Yes	
2300 Vent Hole	Standard	18014	100	8/31/1989	N.D	Yes	
2300 Vent Hole	Standard	18015	100	8/31/1989	N.D	Yes	

D14 Mary		Manufacturer		Sample	PCB	Laboratory	
Permit/Mine	Manufacturer	Serial No.	KVA	<u>Date</u>	(ppm)	Sheet Avail.	Comments
Beaver #1	General Electric		250	6/3/1989	N.D	Yes	
Beaver #2	General Electric	18348	250	6/3/1989	N.D	Yes	
Beaver #3	General Electric	18349	250	6/3/1989	N.D	Yes	
Beaver #4	Moloney	19911	100	6/3/1989	N.D	Yes	
Yard	Central	19392	100	6/3/1989	N.D	Yes	
Beaver #6	Central	19393	100	6/3/1989	N.D	Yes	
1060 Sub	Westinghouse	1589187	100	6/3/1989	15.0	Yes	
1060 Sub	Westinghouse	1589186	100	6/3/1989	N.D	Yes	
1060 Sub	Westinghouse	1589185	100	6/3/1989	15.0	Yes	
900 Vent	Gardner	80226	50	6/3/1989	N.D	Yes	
900 Vent	Gardner	80227	50	6/3/1989	N.D	Yes	1 · · · · · · · · · · · · · · · · · · ·
900 Vent	Gardner	80222	50	6/3/1989	N.D	Yes	
500 Vent	General Electric	D966326-59Y	50	6/3/1989	N.D	Yes	<u> </u>
500 Vent	General Electric	D968923-59Y	50	6/3/1989	N.D	Yes	
500 Vent	General Electric	D971955-59Y	50	6/3/1989	N.D	Yes	
2200 Vent	Allis Chalmers	1770618	100	6/3/1989	N.D	Yes	Removed Oct. 2002
2200 Vent	Westinghouse	64C630	250	6/3/1989	74.0	Yes	Removed Oct. 2002
2200 Vent	Westinghouse	77A27009	250	6/3/1989	N.D	Yes	Removed Oct. 2002
2200 Vent	Westinghouse	64C629	250	6/3/1989	14.0	Yes	Removed Oct. 2002
LaSal Incline	Moloney	148430	100	6/3/1989	N.D	Yes	
LaSal Incline	Moloney	1490603	100	6/3/1989	5.0	Yes	
LaSal Incline	Moloney	1484379	100	6/3/1989	N.D	Yes	
Yard	Moloney	1489733	50	6/3/1989	N.D	Yes	
Yard	Central	19391	100	6/3/1989	N.D	Yes	
LaSal XLE Comp	Esco	23843	167	9/1/1991	2.0	No	Removed Oct. 2002
LaSal XLE Comp	Esco	23844	167	9/1/1991	2.0	No	Removed Oct. 2002
LaSal XLE Comp	Esco	23845	167	9/1/1991	2.0	No	Removed Oct. 2002
Beaver Shaft	Howard	13051-1180	100	11/12/1990	?	No	San Miguel Power
Beaver Shaft	Howard	29783-2280	100	11/12/1990	?	No	San Miguel Power
Beaver Shaft	Howard	29781-2280	100	11/12/1990	?	No	San Miguel Power
Beaver #5	CTC	18126	100	8/15/1989	14	Yes	

#### Hecla Shaft Permit M/037/043

1

Hecla	Porter	P690020	1000	6/3/1989	N.D.	Yes	
Hecla	Weaver	19003	1000	6/3/1989	810	Yes	Removed Oct. 2002
Main Sub - Oil Switch		H1-1		8/6/1992	14.0	Yes	
Main Sub - Oil Switch		H1-2		8/6/1992	21.0	Yes	
Main Sub - Oil Switch		H1-3		8/6/1992	21.0	Yes	
Main Sub - Oil Switch		H2-1		8/6/1992	190	Yes	
Main Sub - Oil Switch		H2-2		8/6/1992	20.0	Yes	
Main Sub - Oil Switch		H2-3		8/6/1992	10.0	Yes	
Main Sub - Oil Switch		H3-1		8/6/1992	13.0	Yes	
Main Sub - Oil Switch		H3-2		8/6/1992	19.0	Yes	
Main Sub - Oil Switch		H3-3		8/6/1992	20.0	Yes	